

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JM HOLDINGS 1 LLC and CEDAR HOLDINGS, LLC,

Case No. 1:20-cv-03480 (JPO)

Plaintiffs,

v.

QUARTERS HOLDING GmbH,

Defendant.

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**NOTICE OF MOTION FOR
IMPOSITION OF
SANCTIONS PURSUANT TO
RULE 11**

PLEASE TAKE NOTICE, that upon the Declaration of Barbara Albert, dated July 24, 2020, and the exhibits annexed thereto, the accompanying Memorandum of Law, dated July 27, 2020, and all prior pleadings and proceedings in this case, Defendant Quarters Holding GmbH, by and through their undersigned counsel, hereby move this Court before the Honorable J. Paul Oetken, at the United States Courthouse, 40 Foley Square, Courtroom 706, New York, New York, 10007, for an order (i) granting Defendant's motion for sanctions pursuant to Federal Rule of Civil Procedure 11; (ii) awarding Defendant its costs and attorneys' fees incurred in defending this action and bringing this motion; (iii) directing Plaintiffs to return Tenant's security deposit with interest; (iv) barring Plaintiffs' claims by dismissing them with prejudice; and (v) granting Defendant such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that Plaintiffs' opposition, if any, must be served within fourteen (14) days in accordance with Local Rule 6.1(b) of the United States District Court of the Southern District of New York.

PLEASE TAKE FURTHER NOTICE, that Defendant's reply papers, if any, must be served within seven (7) days of service of Plaintiffs' opposition papers or otherwise in accordance with applicable law.

Dated: New York, New York

July 27, 2020

AKERMAN LLP

By: /s/ Joshua D. Bernstein
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